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*Attorneys for Defendants* XINGKE ELECTRONICS  
 (DONGGUAN) CO., LTD., formerly known as  
 SINCO ELECTRONICS (DONGGUAN) CO., LTD.,  
 LIEW YEW SOON aka, MARK LIEW, NG CHER  
 YONG. aka CY NG, and MUI LIANG TJOA aka ML  
 TJOA

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,  
 LTD.; XINGKE ELECTRONICS  
 (DONGGUAN) CO., LTD.; XINGKE  
 ELECTRONICS TECHNOLOGY CO., LTD.;  
 SINCOO ELECTRONICS TECHNOLOGY CO.,  
 LTD.; MUI LIANG TJOA (an individual); NG  
 CHER YONG aka CY NG (an individual); and  
 LIEW YEW SOON aka MARK LIEW (an  
 individual),

Defendants.

Case No. 3:17-CV-05517-EMC

Action Filed: September 22, 2017

**DEFENDANTS' SUPPLEMENTAL  
 DEPOSITION DESIGNATIONS**

**Judge: Honorable Edward M. Chen**

**Trial: November 1, 2021**

Plaintiff SinCo Technologies Pte. Ltd, (“SINCO”) hereby provides objections and counter designations to Defendants’ identified Deposition testimony. Any designation including discussion by the attorney, other than objections, with the witness are intended as it provides context for later testimony.

ABBREVIATION	OBJECTIONS
106	Rule of completeness to designation. (page:line to page:line). Objections removed.
401/402	Testimony in designation not relevant to claims or defenses in this action.
403	Designation causes unfair prejudice, confuses the issues, misleads the jury, wastes time (asked and answered).
609	Presumption Against Reference to Prior Conviction over ten years old. <sup>1</sup>
MIL	Subject to motion <i>in limine</i> .
LC	Calls for legal conclusion.
RD	Testimony is not based on Personal Knowledge, but simply reading a document provided by counsel.
NR	Non-responsive; no question pending.
SPEC	Calls for speculation.
V	Vague.
M	Misstates the testimony.

Any objections are presumed removed from any deposition testimony read or played before the Jury. Defendants designations were inconsistent<sup>2</sup> in skipping or designation of attorney objections along with designation of the counsel asking the question (which is not spoken, and not on the video), in either event such material would not be read or appear on the deposition video. SINCO’s counter designations again assumes that any objections by counsel will be removed from the testimony, as well as reference to the attorney asking the question.

<sup>1</sup> Defendants’ Deposition Designations is not Proper Notice as required under FRE 609.

<sup>2</sup> For Example: Bryan Lim 19:3; 25:18; 59:13-19; 62:17-20; 80:23 and 85:22 (Defendants designating objections) 39:17; 40:3; 42:21; 47:20; 48:8 and 17; 51:17; 56:4 and 11; 57:18; 64:20 and 65:7 (Defendants designating attorney name). Many more are included not herein referenced.

**PLAINTIFF COUNTER-DESIGNATIONS AND OBJECTIONS**

These counter-designations anticipate the removal of objections and interaction not in the form of a question by counsel as presented to the Jury.

**I. GOOGLE - Wee Phurm (Andy) Lim****DEPOSITION OF ANDY LIM TAKEN ON OCTOBER 3, 2021**

*(Page and Line Numbers)*

<b>DEFENDANTS' DEPOSITION DESIGNATION</b>	<b>OBJECTIONS TO DESIGNATIONS</b>	<b>PLAINTIFF COUNTER- DESIGNATION</b>	<b>OBJECTIONS TO COUNTER-DESIGNATION</b>
8:17-21		9:4-12	
		9:15-19	
		10:2-18	
11:4-5		11:6-9	
11:12-15			
11:17-12:7		12:8-9	
		12:18-23	
13:4-14:11			
14:13-16			
14:19-20			
15:2-5			
15:8-10			
15:12-13			
15:15-16:8			
16:10		16:13-15	

DEPOSITION OF ANDY LIM TAKEN ON **OCTOBER 3, 2021**

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
16:16-19		16:20-22	
16:23-17:19			
17:21-22			
17:24-18:11		18:12-17	
18:20-19:2		19:3-6	
20:4-21:1			
21:14-22:20		21:7-12	
		22:21-23:10	
23:13-24:6		24:12-14	
25:2-4			
25:7-21			
25:23-24			
26:1-26:4			
26:6-10			
26:13			
26:16-20			
27:3-14			
27:25-29:6		29:7-24	
30:5-7			

DEPOSITION OF ANDY LIM TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
30:11-25			
31:3-7			
31:10-14			
31:17-18		31:21-32:5	
32:19-33:12		32:12-18	
		33:13-22	FRE 401. Assumes facts not in evidence.
34:11-17			
34:19-20			
34:25-35:1			
35:3-4			
35:7-15			
35:17-36:2			
36:4-13			
36:15		36:18-25	FRE 401 / 403 - Google's response to a hypothetical supplier's violation of environmental laws is irrelevant and prejudicial; implication is that DG violated such laws.

DEPOSITION OF ANDY LIM TAKEN ON **OCTOBER 3, 2021**

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
37:3-7			
37:10		37:13-17	
37:24-38:12			
38:15-16			
39:9-40:2		39:2-7	
41:9-17		40:13-41:6	FRE 401 / 403. Testimony regarding CNC machine to build tools irrelevant to case.
		41:18-42:22	
42:25-43:6		43:20-44:2	
44:18-45:1		45:17-46:3	
46:16-46:19			
46:22-47:18		47:19-23	
		48:6-8	
		48:14-21	
		49:21-50:11	
		50:23-52:1	
		53:17-25	
		54:18-21	

DEPOSITION OF ANDY LIM TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
		54:24-55:9	
		56:11-20	FRE 401 / 403. Whether a supplier violated a law is irrelevant to the case; prejudicial to suggest that Defendants violated the law.
		57:20-22	FRE 401 / 403. Supplier Responsibility Report irrelevant; implication is that Defendants were in violation of it, but there is no evidence to support this.
		58:10-11	
58:13-21			
59:10-14		59:15-60:1	FRE 401 / 403. Testimony re Tjoa's alleged "firing" violates Order on Defendants' Motion in Limine No. 6 Order; assumes facts not in evidence; lack of foundation.
		60:11-17	FRE 401 / 403. Testimony re Tjoa's alleged "firing" violates

DEPOSITION OF ANDY LIM TAKEN ON **OCTOBER 3, 2021**

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
		61:14-16	
		61:23-24	
		62:3-64:7	
		64:11-13	
		64:17-65:5	
65:6-8			
65:11-21		66:1-9	
66:24-25		66:17-19	Facts not in evidence / Foundation
67:10-13			
67:15-68:5			
68:7-8			
68:17-21			
68:23		69:5-10	FRE 401 / 403. Lack of foundation; assumes facts not in evidence.
		69:18-7	Counter-designation is unclear. To the extent the counter designation refers to 70:7 as the end line, the objection is FRE 401. Lack of foundation and assumes facts not in



DEPOSITION OF ANDY LIM TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
			evidence.
		70:10-12	FRE 401 / 403 / Lack of foundation / assumes facts not in evidence.
		70:21-71:4	
		71:14-17	FRE 401 / 403. Whether Google expects suppliers to follow the law suggests that Defendants did not.
		74:12-20	
		75:9-20	FRE 401 / 403 / Lack of personal knowledge. Irrelevant whether the witness is aware that Defendant filed trademark applications in the US.
78:6-18			
78:22-80:5			
80:8-21			
80:24-81:19		81:20-21	Counter-designation is question but no witness answer counter-designated.

DEPOSITION OF ANDY LIM TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
82:5-21			
83:17-84:2			
84:9-85:12			

**II. APPLE - Paul Carter**DEPOSITION OF PAUL CARTER TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
9:1-10:4			
10:13-12:7			
13:12-14:17		14:18-25	
15:1-10			
15:13-17			
15:19-25			
16:2-5			
17:8-11		17:5-7	

DEPOSITION OF PAUL CARTER TAKEN ON OCTOBER 3, 2021*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
17:16-21		17:12-15	Rule 401. Plaintiff's counter-designation is counsel's objection, which Plaintiff indicated above should be removed from the testimony.
17:23-18:11		18:12-20	
18:21-23			
18:25			
19:2-19		19:20-20:1	
20:16-19		20:4-15	
20:21-21:3			
21:14-18			
22:4-14			
22:18-22			
22:25-23:10		23:21-24:3	
24:12-22			
25:1-20			
25:22-26:2			
26:5-9			
27:10-28:19		28:20-29:1	

DEPOSITION OF PAUL CARTER TAKEN ON **OCTOBER 3, 2021**

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
29:4-12			
29:14		29:17-25	
30:1-2			
30:7-12		30:14-18	
		31:2-32:9	Counsel misstates and mischaracterizes the witness's testimony at 31:17-18.
		33:4-7	
		33:21-34:22	Lack of foundation. Counsel is testifying at 34:11-13.
34:23-25			
35:2-13			
35:16			
35:19-36:1			
36:3-9		36:10-15	
		40:11-17	FRE 401. 40:11-17 contains witness's counsel's explanation of Apple's general position regarding its project code names and is not relevant to the witness's

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
			testimony.
41:18-21		41:15-17	
41:25-42:16			
42:19-43:4			
43:7-9		43:11-19	
43:20-22			
43:24-44:5			
44:7-8			
44:10-22		44:14-45:4	
		46:17-21	
		47:4-12	
		47:17-48:2	
		48:21-24	
		49:5-8	
		49:11-14	Counsel is testifying and mischaracterizes witness's testimony at 49:11-14.
		49:17-50:12	
50:15-17			
50:20-22			

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
50:25-51:3			
51:5-8			
51:10-15			
51:17-25			
52:7-8			
52:11-13		52:16-17	
		52:21-25	
		53:2-9	
53:10-12			
53:14-18			
		54:14-25	FRE 403. Cumulative evidence, the witness is already presented as and confirmed that he is testifying on his personal behalf only. <i>See, e.g.</i> , 17:12-15, 24:17, 25:1, 31:14-15, 32:6.
		55:3-10	Counsel misstates and mischaracterizes witness's testimony as to whether there is confusion by other business units within Apple.

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
		55:13-17	FRE 401 / 403. Violates Order on Defendants' Motion in Limine No. 6 Order.
		55:20-56:18	
		56:20-57:8	
		58:9-15	FRE 401. Counsel's question is hypothetical and not relevant.
60:12-22			
60:24-61:11		61:22-62:5	
		62:7-15	
		63:12-22	
		63:23-25	
		64:9-11	
		64:18-65:9	
		65:12-16	
66:10-12			
66:15-23			
67:2			
67:4-18			

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
67:20-22			
67:25-68:8			
68:10-13		68:22-69:5	
		69:8-24	Mischaracterizes the witness's testimony; counsel is testifying.

Dated: October 26, 2021

ARNOLD &amp; PORTER KAYE SCHOLER LLP

By: /s/ Joseph Farris  
JOSEPH FARRIS

*Attorneys for Defendants*  
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CHER YONG. aka CY NG, and MUI LIANG  
TJOA aka ML TJOA



**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served a copy of the foregoing **DEFENDANTS' SUPPLEMENTAL DEPOSITION DESIGNATIONS** via the Court's ECF system on October 26, 2021.

/s/ Joseph Farris